

OCT 7 1985

D. R. Spell, P.E.
Head, Environmental Branch
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2144 Melbourne St., P.O. Box 10058
Charleston, S.C. 29411

MC GREGOR NAVAL WEAPONS
7X9170024708

Dear Mr. Spell:

Thank you for the opportunity to review the document "Confirmation Study And Evaluation Of Remedial Alternatives Report" for the Area G, Pesticide Site at the Naval Weapons Industrial Reserve Plant, McGregor, Texas. In general, we concur with the conceptual closure plan described in Alternative 2, and request the opportunity to review the final closure specifications when they become available. We do, however, offer the following concerns and comments which we feel should be addressed in the final closure plan:

1. The report notes that depth to groundwater in the area was observed to be greater than 15 feet. Yet, only 2 of the 6 monitoring wells extend below a depth of 10 feet. Thus, the construction and placement of these wells are inadequate to determine groundwater flow direction and to provide useful information regarding potential contaminant migration. Groundwater flow direction in Area G should be determined, and an appropriate number of monitoring wells should be installed, including at least one upgradient and 3 downgradient wells.
2. The post-closure monitoring period of 3 years is inadequate. In keeping with the RCRA requirement for hazardous waste landfills of this type, a 30 year post-closure monitoring period should be instituted.
3. Point 11-A-4 was shown to be contaminated with 37.5 ppm DDT at the surface. This point is not included in the area of affected soil shown in Figure 5-1. In order to meet your goal of remediation of all soils containing 10 ppm or more of pesticides, the area around point 11-A-4 will need to be addressed.

Additionally, we have not yet received a copy of the report "Ground Water Quality Assessment, Area P", as requested in our letter of April 10, 1984. We again request that a copy of that report be sent for our review.

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Should you have any questions regarding our review, please contact
Greg McCabe at (214) 767-9705.

Sincerely,

Original signed by
Robert Hanneschlager

Robert E. Hanneschlager, P.E.
Chief *E. Hanneschlager*
Superfund Compliance Branch

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